

December 31, 2018

Monet Vela
Office of Environmental Health Hazard Assessment
1001 I Street, 23rd Floor
P. O. Box 4010
Sacramento, California 95812-4010
Submitted electronically via <https://oehha.ca.gov/comments>
Copy submitted via email: P65Public.Comments@oehha.ca.gov

**Re: Comment on Proposed Amendments to Article 6 Clear and Reasonable Warnings Section
25600.2 Responsibility to Provide Consumer Products Exposure Warnings**

Dear Monet Vela:

The Consumer Technology Association™ (CTA) respectfully submits these written comments on the proposed amendments from the California Office of Environmental Health Hazard Assessment (OEHHA) to make changes to Title 27, California Code of Regulations, section 25600.2, subsections (b), (c) and (f), Responsibility to Provide Consumer Product Exposure Warnings. CTA understands that OEHHA is pursuing these proposed amendments to provide additional clarification to certain aspects of the Article 6 Clear and Reasonable Warnings requirements.

CTA is the trade association representing the U.S. consumer technology industry, which supports more than 15 million U.S. jobs. Our membership includes more than 2,200 companies – 80 percent are small businesses and startups; others are among the world's best known manufacturer and retail brands. Our members have long been recognized for their commitment and leadership in innovation and sustainability, often taking measures to exceed regulatory requirements on environmental design, energy efficiency and product and packaging stewardship.

CTA appreciates California's interest in clarifying aspects of the Article 6 Clear and Reasonable Warning requirements in response to stakeholder questions and feedback. CTA respectfully submits the following requests for clarification from OEHHA on the proposed amendments:

- Section 25600.2(c)(1): This portion requires that "confirmation of receipt...must be received electronically or in writing...". Can OEHHA clarify the difference between a confirmation that is electronic versus one in writing? Is there a clear or important distinction between the two options?
- Section 25600.2(f): CTA requests that OEHHA clarify or define what qualifies as "sufficient specificities" to provide actual knowledge of a chemical exposure. It is unclear what is required based on the proposed language. The term "sufficient specificities" is vague (e.g., is it limited to the product name? other information?). Additional clarification is necessary for compliance purposes.

CTA Comments on Article 6 Clear and Reasonable Warnings Section 25600.2

December 31, 2018

CTA appreciates this opportunity to provide comments to OEHHA. If you have any questions regarding these comments, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Katie Reilly', with a stylized, cursive script.

Katie Reilly
Senior Manager, Environmental and Sustainability Policy
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